

EXHIBIT G

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WALGREEN CO.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CITY AND COUNTY OF SAN
FRANCISCO, et al.,

Plaintiffs,

v.

PURDUE PHARMA L.P., et al.,

Defendants.

Civil Case No.: 3:18-CV-07591-CRB

**DECLARATION OF STEN JERNUDD IN
SUPPORT OF WALGREENS' RESPONSIVE
STATEMENT TO PLAINTIFF'S DISPUTE
LETTER RE: WALGREENS' DUE
DILIGENCE NOTES**

1 I, Sten Jernudd, make this declaration pursuant to 28 U.S.C. § 1746. I hereby state as follows:

2
3 1. I am an attorney at law admitted to practice in the State of Illinois, and I am an
4 associate at Bartlit Beck LLP, 54 West Hubbard Street, Chicago, Illinois, 60613, counsel for
5 Walgreen Co. (“Walgreens”). I am familiar with the facts described herein, which are based on my
6 work for Walgreens in the opioids litigation. I respectfully submit this declaration in support of
7 Walgreens’ Responsive Statement to Plaintiff’s Dispute Letter re: Due Diligence Notes.

8 2. I have confirmed with Walgreens employees that hard copy prescriptions are scanned
9 at “data entry,” the first phase of the dispensing process. *See also, e.g.,* Ex. 1 at 10,
10 WAGMDL01166503 (describing Walgreens’ data entry process).

11 3. Pharmacy technicians—not pharmacists—are responsible for data entry. Pharmacists
12 typically do not review, or make notes on, prescriptions until later in the dispensing process. *See,*
13 *e.g.,* Ex. 1 at 13 (describing Walgreens’ data review process, as distinct from data entry).

14
15 Dated: June 3, 2021

Respectfully submitted,

16 By: /s/ Sten Jernudd
17 Sten Jernudd
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EXHIBIT 1



Pharmacy Script Processing Audit



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Walgreens
AT THE CORNER OF **HAPPY** & **HEALTHY**™

The Script Fill Process Overview in IC+

V02DA.wq.0010.01.gif - Windows Picture and Fax Viewer

TeamRx - Work Queue

Application Patient Options Details Utilities Window

PTIME PAT PBR F1 0 CMD 4 F4 3 DUR 0 TPR 2 STATISTICS

1 Pat 2 Pat 3 Pat 4 Pat 5 Pat 6 Pat

Search By
Enter one of the following:

Patient Phone: Patient Last Name:

Prescriber Last Name: Rx Status: Rx #: 1280339

Search

Work Queue

Rx #	Patient	Drug	Status	E-Pay	Bin	Type	Rx Price
1241924	MORENO, MARK	CLARINEX 5MG TABLETS					\$5.00

Regular Rx Path →

ENTERED → REVIEWED → PRINTED → FILLED → READY → SOLD

Comments Exceptions... Print Update Rx... Review Partial Fill Close

CJD ZEM OK 10:37 AM





Data Entry - Scan RX

Greet & Scan and Entering Refills: Scanning Hard Copies



Scanning Hard Copies

Using the scanner:

1. Feed the prescription hard copy with the front side facing down and away from you.
2. Make sure the prescription is centered on the scanner.
3. Repeat process until you scan all of this patient's prescriptions.
4. Press Enter on your keyboard to select the Stop Scanning button.

Transcript

[Carl] To begin the scanning process, position the prescription hard copy with the front side facing down and away from you. Then, feed it top first into the scanner placing the hard copy in the center of the scanning tray to ensure that the scanned image appears clearly in Intercom Plus. The scanner automatically captures both the front and the back of the



Data Entry - Enter Pick-Up and Promise Time

Patient Entry

Application Patient Scan Utilities Window

WAIT 15Min 10:52 AM F1 0 CMD 4
PAT 0Min35Sec 1 Calls F4 3 DUR 0 TPR 2 TIP 0 STATS
PBR 0Min20Sec 1 Calls

1 Pat 2 Pat 3 Pat 4 Pat 5 Pat 6 Pat

Search By
☒ Phone:
 Name:
☐ Rx #:

Pick-Up Information

We can have the prescription(s) ready in 15 minutes at:
 10:52 AM

Will you be waiting?

What time would you like to pick up the prescription(s)?
 At: 8 : 4 PM MON

Store

 Central

Scanning
 Scanning

If the Patient is waiting:
 • Select Yes
 If the Patient isn't waiting:
 • Select No
 • Enter the Pick-Up Time and select OK

[Carl] However, if the patient says that they would like to pick up their prescription later...

Transcript Page 4 of 24

back menu exit replay next



Data Entry – Enter Prescription Data

V01CB.pe.0060.02.gif - Windows Picture and Fax Viewer

TeamRx - Prescription Entry

Application Patient Options Scan Details Utilities Window

John Smith M 02/10/1969 40 212 Birch St. (847) 555-5555

WAIT 15Min 10:52 AM F1 0 CMD 4
PAT 0Min35Sec 1 Calls F4 3 DUR 0 TPR 2 TIP 0 STATS
PBR 0Min20Sec 1 Calls

Image Displaying Image 1 of 1

NORTH PARK INTERNAL MEDICINE
6262 N. Route 83
Arlington Hts., IL 60004
T: (847) 555-8200
F: (847) 555-8221

Date 10/18/10 Patient# 5706
Name John Smith
Address
847-555-5555 2/10/69

Clarinet 5MG
Sig: TK 1 po QD
Qty: 30

☒ Generic
☒ Refills

Meredith Kearns, MD Meredith Kearns

Page 1 of 1 Annotations All There are no annotations Rotate Zoom

Prescription Information

Rx #: Last Refill:
Date: 10/18/2010
Drug ID: CLARINEX 5MG TABLETS
Manufacturer: SCHERING Orange Book:
Drug Expir: 10/18/2011 DAW: N Substitute:
Quantity: Qty Disp: Qty Rem:
Directions: TAKE AS DIRECTED
Days Supply: Refills: Refills Before: 10/18/2011
Def Phone: Pbr ID: State:
Prescriber:

Payment Information

Type: CASH Fee: Copay:
Pay Code:
Cash Price:

Smart Script Entering
Rx1 Rx2 Rx3

Rx Comments History... Patient Cmts Fill->Close Fill->Keep Img Cancel

CJD ZEM OK 10:37 AM



Data Review

V15BA.vdr.0075.02.gif - Windows Picture and Fax Viewer

Data Review

John Smith 09/18/1965 45 M (847) 555-0784 547 Main St.

Rx Image **Displaying Script 1 of 1**

**Family Practice Physicians
Loyola Medical Center**

Frederick Ellis, MD 847-555-0784 Dinesh Singh, MD

Name: John Smith DOB: 9/18/65
Address: 547 Main St. Date: 10/18/10

Naprosyn 500mg
sig: TK 1 po BID prn #30

Substitute Generic: ☒
May be Refilled: 3
DEA# CS9183351 Sign. Dinesh Singh

Suite 215, 7250 Campus Drive, Chicago, IL 60636
Telephone: (312) 555-4000 Fax: (312) 555-4113

Page **Annotations** **Rotate** **Zoom**

1 of 1 All There are no annotations

One Time Label Cmts
Rx:

Rx marked Consultation Required - Use Rx Comments to clarify

WAIT 15Min 10:52 AM F1 0 CMD 4
PAT 0Min35Sec 1 Callb F4 3 DUR 0 TPR 2 TIP 0 STATS
PBR 0Min20Sec 1 Callb

Rx #: 1280653 08303 **NEW**

Prescription Information

Select if incorrect

1. Patient Name: JOHN SMITH

Select each field that is incorrect

Drug: NAPROXEN 500MG TABLETS
Generic For: NAPROSYN 500MG TABLETS
Directions: TAKE ONE TABLET BY MOUTH TWICE DAILY AS NEEDED
Qty: 30 Refills: 3
Qty Disp: 30 Refills Before: 10/18/11
Days Supply: 15 DAW: N
Date: 10/18/10 Subst: G

2. Product

Select if incorrect

Name: DINESH SINGH

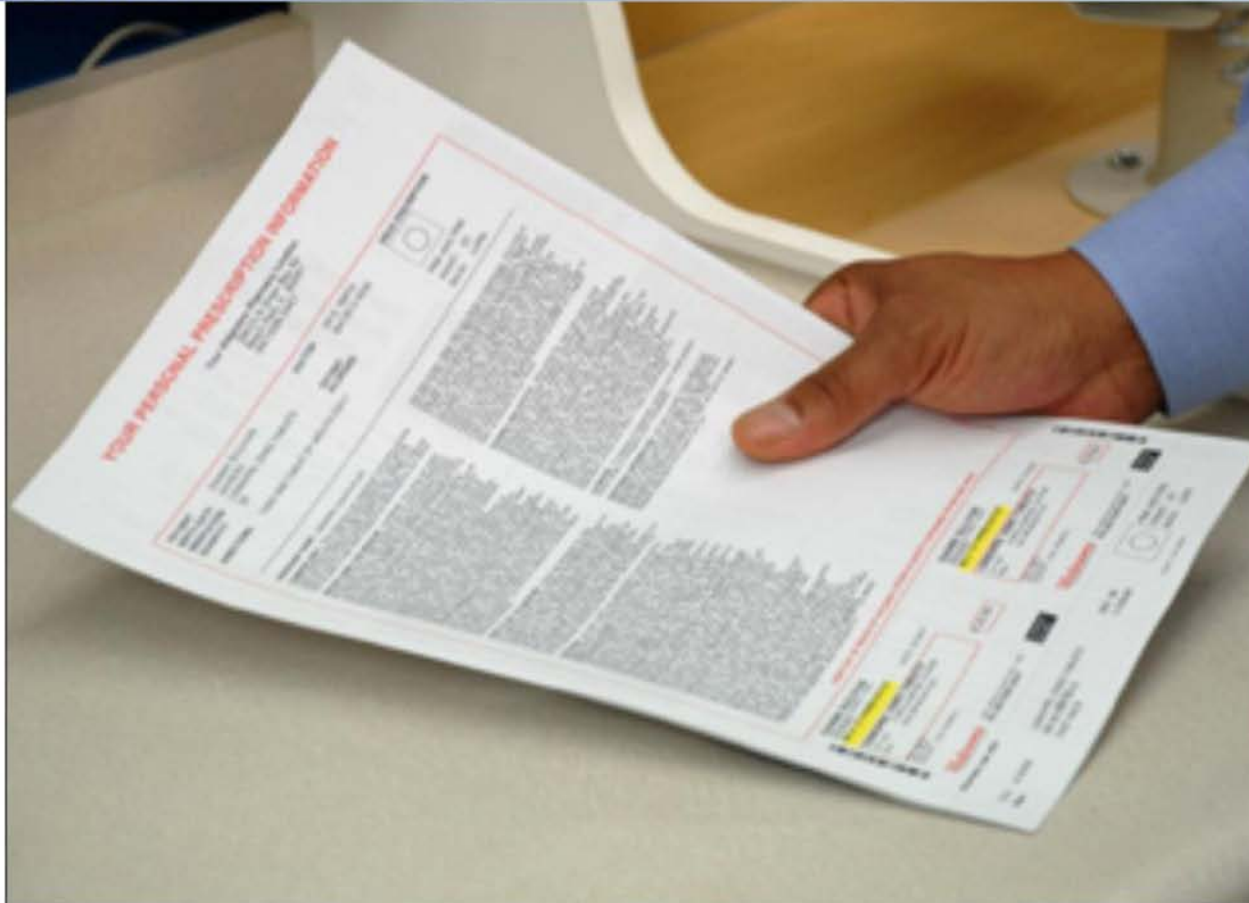
3. Prescriber Phone: (312) 555-4000 DEA#: CS9183351

Reject Comments



Fill Process Begins - Print Leaflets

C_fill_label_stack.jpg - Windows Picture and Fax Viewer



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